

March 19, 2007

The Honorable John Dingell
Chairman, Committee on Energy and Commerce
U.S. House of Representatives
Washington, DC 20515-6115

Dear Mr. Dingell;

It has recently come to my attention that you have issued a letter requesting input on the topic of climate change. As an environmental professional working in the industrial sector, I request that you consider my humble comments.

Within your letter, you issued four specific issues. I will try to address them individually but please note that several of the comments below could be considered general context.

Your Question #1 – topics to be addresses

1. Goal setting. It is widely accepted that green house gas emissions have increased substantially during the industrial revolution. Reductions are both prudent and needed. However, I am concerned that there is no proven concept of what the harmful or acceptable levels are. As such, it would be difficult, if not ill advised, to set fixed goals. Furthermore, considering that the man-made impacts are only part of the natural cycle, how would these goals change in the event of natural events (such as an upswing in volcanic activity).
2. Net environmental benefit. As the issue of climate change is considered, as with many topics it appears to be considered as a stand alone issue. However, this topic is deeply woven in a myriad of direct and indirect issues. Example – in the operations for which I am employed, we use pollution controls to destroy VOC (volatile organic compound) emissions. For each ton of VOC destroyed we generate approximately 60 tons of CO₂ emissions. However, the current regulatory format and system has difficulty managing emissions across regulatory boundaries. We could effect a significant reduction in CO₂ emissions, however the regulatory framework would not allow for an increase in VOC emissions.
3. Reduction based policies. With many “conventional” pollutants, more is bad and zero is a realistic if not ideological target. However, this is not necessarily true for CO₂ and greenhouse gas emissions. There a natural need. However, current pollution control policy focuses on reductions. I believe that a prudent policy would address both reduction activities and promoting other programs that would substantiate the consumption of these gases.

Your Question #2 – Cap and trade

1. Burden on industry. In your question #2, article A, you ask what sectors should be covered. This raises an immediate concern that any limits would be initially (only?) imposed on industry. Climate change is truly a global issue and the sources are both natural and man made. While industry does bare the burden of the issue, everyday issues such as travel, residential life and the mere act of breathing all have an impact. It is impractical to believe that simple sector or sectors can account or compensate for all of these activities.
2. Burden on regions. Regardless of sector chosen there are additional impacts based on region. The natural gas consumption for similar activities located in Maine or Michigan would be higher than those located in Texas or New Mexico, on the basis of winter heating alone.
3. Clear basis for a cap. Not understanding the body of data given you, I am concerned quite concerned on how a cap would be set. Most (almost all) companies do not track CO2 emissions. With that said, I would question the accuracy of setting goals early with incomplete data. One could generate a national CO2 value based on natural gas, electrical and other utilities consumption. However, I do not believe that would be any support to implement a cap on utilities consumption. I suspect that if you could compare the values given by both sectors, they would differ greatly. Once again, these issues belay the absolute necessity of well thought goal setting.
4. In article K, you question the management of revenues. I would be highly offended if the development of environmental stewardship and climate control becomes reviewed as an issue of revenue for any governing agency, local or international. In the event that emission trading generates revenue, the steward of those reductions should receive the revenues. With that said, I can only imagine that the certification and management of such emission reductions would be a substantial program.

Question #3 – Voluntary versus mandatory

1. In my humble experiences, a voluntary program would not be able to achieve a noteworthy degree of success, unless some substantial and tangible incentives are offered.
2. On the other hand, (as was discussed in question #1, response #2) most regulatory frameworks are ill equipped to managed programs that consider net environmental benefit or secondary impacts.

Question #4 – International obligations

Two personal thoughts...

1. While truly a global issue, we should not develop programs that undermine our nation's abilities and strengths, and,
2. In that same vein, we must remember that each nation has its own unique abilities, resources and drawbacks, whether economic, cultural or political. While obligated to be support others and be good stewards of our nation's many gifts, we should also not surrender these in the name of international standardization.

I hope that these comments are of some value and insight to you and the Committee. I appreciate both the magnitude and controversial nature of the project for which you are about to embark. I extended my best wishes in your efforts

Sincerely,

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